



Notice of Service of Process

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Transmittal Number: 19764846
Date Processed: 05/07/2019

Primary Contact: Bruce Buttaro
Liberty Mutual Insurance Company
175 Berkeley Street
Boston, MA 02116

Entity:	Liberty Mutual Insurance Company Entity ID Number 1765547
Entity Served:	Liberty Mutual Insurance Company
Title of Action:	Jerry Jones vs. Liberty Mutual Insurance Company
Document(s) Type:	Petition
Nature of Action:	Contract
Court/Agency:	Harris County District Court, TX
Case/Reference No:	201924752
Jurisdiction Served:	Texas
Date Served on CSC:	05/06/2019
Answer or Appearance Due:	Other/NA
Originally Served On:	CSC
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EXHIBIT
A

**MELLOTT LAW, P.C.
ATTORNEYS AT LAW**

FROM THE DESK OF
ANGIE ZEPEDA, PARALEGAL
mellottlawparalegal@gmail.com

405 MAIN STREET, SUITE 602
HOUSTON, TEXAS 77002
TEL. 713-225-0240
FAX 866-788-0160

May 2, 2019

Certified Mail Return Receipt Requested: 7018 1130 0000 8758 7239

Corporation Service Company
DBA, CSC-Lawyers Incorporating Company
2111 East 7th Street, Suite 620
Austin, Texas 78701-3218

Re: JERRY JONES VS. COUNTY MUTUAL INSURANCE COMPANY; CASE NO.
201924752; IN THE 129TH DISTRICT COURT; HARRIS COUNTY, TEXAS

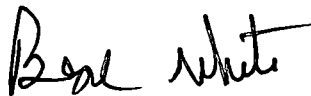
To Whom It May Concern:

Enclosed please find, in the above-referenced cause of action, a copy of the Original Petition, which was filed on April 5, 2019.

Should you have any questions, please do not hesitate to call this office.

Respectfully,

Brock White



CAUSE NO. _____

JERRY JONES	§	IN THE DISTRICT COURT
	§	
VS	§	OF HARRIS COUNTY, TEXAS
	§	
LIBERTY MUTUAL INSURANCE COMPANY	§	_____ JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION

NOW COMES Plaintiff JERRY JONES, complaining of Defendant LIBERTY MUTUAL INSURANCE COMPANY, and for cause of action would show the Court the following:

DISCOVERY CONTROL PLAN

1. As provided in Rule 190, Texas Rules of Civil Procedure, Plaintiff intends to conduct discovery under Level 2.

PLAINTIFF

2. This Petition is filed by JERRY JONES, Plaintiff, an individual whose address is 8127 GLEN CLIFFE LANE, HOUSTON, TEXAS 77070. The last three digits of Plaintiff's driver's license number are 487. The last three digits of Plaintiff's Social Security number are 385.

DEFENDANT

3. Defendant, LIBERTY MUTUAL INSURANCE COMPANY, is an individual who may be served with process at Defendant's residence by certified mail return receipt requested addressed to Corporation Service Company, DBA CSC-Lawyers Incorporating Company at 2111 East 7th Street, Suite 620, Austin, Texas 78701-3218.

VENUE

4. Venue is proper in this county in that the events giving rise to this cause of action occurred within HARRIS County.

JURISDICTION

5. The damages sought in this suit are within the jurisdictional limits of the Court. As required by Rule 47, Texas Rules of Civil Procedure, Plaintiff states that Plaintiff seeks only

6. The facts of this action and the relief sought are subject to the application of Chapter 17 of the Texas Business and Commerce Code, and Defendant is not exempted from this action by Section 17.49 of that code.

NOTICE OF CLAIM

7. Plaintiff's attorney was unable to deliver written notice of this Petition to LIBERTY MUTUAL INSURANCE COMPANY Insurance Company due to the fact that attorney was retained a day prior to the expiration of statute of limitations.

FACTS

8. On April 6, 2017 Plaintiff's house burned down due to an electrical shortage. He filed a claim with LIBERTY MUTUAL INSURANCE COMPANY. His policy number is H37-298-069531-407, the agent was Karen Sable, whose license was suspended and was fired from LIBERTY MUTUAL INSURANCE COMPANY for underwriting the value of Plaintiff's home by \$100,000.00 to \$150,000.00. Due to the house being underinsured by LIBERTY MUTUAL INSURANCE COMPANY employee Plaintiff was and is unable to rebuild his home.

CAUSE OF ACTION

9. Defendant's conduct constituted violations under the Texas Deceptive Trade Practices Consumer Protection Act (Texas Business and Commerce Code, Chapter 17.41, et seq.)(“the Act”). Defendant is liable to Plaintiff under Sec 17.50, Texas Business and Commerce code because Defendant's conduct constituted a producing cause of economic damages and damages for mental anguish sustained by Plaintiff through the following means:

10. Defendant used or employed false, misleading, or deceptive acts or practices that are specifically enumerated in Section 17.46(b) of the Act and that were relied on by Plaintiff to Plaintiff's detriment. Defendant's conduct violated the following specifically enumerated acts or practices listed in that section, all in violation of Section 17.50(a)(2) of the Act.

DAMAGES

11. The above actions of Defendant constituted a producing cause of the economic damages and damages for mental anguish of Plaintiff.

12. Plaintiff seeks economic damages suffered due to the actions of Defendant.

13. Defendant's actions were committed knowingly, therefore, Plaintiff seeks damages for mental anguish and three times the economic damages suffered due to the actions of Defendant.

INTEREST, ATTORNEY'S FEES AND COSTS

14. As authorized in Section 17.50(d), Texas Business and Commerce Code and Section 38.001, Texas Civil Practice and Remedies Code, Plaintiff seeks reasonable attorneys fees and costs of court.

15. Plaintiff seeks prejudgment and post-judgment interest on all damage awards.

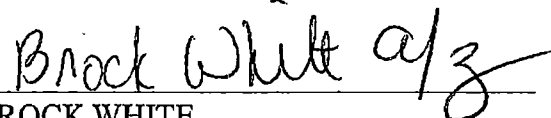
REQUEST FOR DISCLOSURE

16. As provided in Rule 194, Texas Rules of Civil Procedure, Plaintiff requests disclosure of all items listed in Rule 194.2, Texas Rules of Civil Procedure.

PRAYER

Plaintiff prays that citation be issued commanding Defendant to appear and answer herein and that Plaintiff be awarded judgment against Defendant for actual damages, pre-judgment interest, post-judgment interest, costs of Court and for all other relief to which Plaintiff is entitled both in equity and at law.

Respectfully submitted,
MELLOTT LAW, P.C.


BROCK WHITE

BRENDON RIOS

Attorney for Plaintiff

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